

What should be the minimum percentage of megawatt hour (MWh) sales for on-site generation that is up to 2MW, located within Massachusetts, and began commercial operation after December 31, 2007? What should be the appropriate ACP rate for this technology?

Position: Colorado is a great example of a successful on-site generation program (with respect to solar). We recommend there be a solar carve out equal to 2% of all MWh sales, half of which be distributed generation solar. We believe the ACP should be \$250/MWh with no declines over time.

What should the Alternative Compliance Payment (ACP) amount be for Class I, and how should it be calculated?

Position: ACP payments for Class I renewables should be at least \$250/MWh and should not be recoverable from the rate base. Furthermore, the ACP should either remain flat or increase for specific retailers by \$50/MWh for each year the retailer elects to pay the ACP. This is similar to the Delaware program. If a declining ACP is in place, retail electric providers will likely not sign 20 year PPA/REC agreements with solar providers and very few projects will get developed.